

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

LESLY POMPY, AND
INTERVENTIONAL PAIN MANAGEMENT
ASSOCIATES, P.C.
Plaintiffs,

V

Case No. 2:19-cv-10334-GCS-SDD
Honorable George Caram Steeh

MBT FINANCIAL CORP., doing business
As Monroe Bank and Trust; SUSAN MEHREGAN,
THOMAS SCOTT, TINA TODD, JESSICA CHAFFIN,
JACK VITALE, in both individual and official capacities,
MARC MOORE, ROBERT BLAIR, JON LASOTTA,
SHAWN KOTCH, BRIAN BISHOP, in both their individual
And official capacities; BLUE CROSS BLUE SHIELD OF
MICHIGAN, BLUE CROSS BLUE SHIED OF MICHIGAN MUTUAL
INSURANCE COMPANY, BLUE CROSS COMPLETE OF
MICHIGAN, LLC, BLUE CROSS COMPLETE OF MICHIGAN,
MICHAEL ZSENYUK, JIM GALLAGHER, BRIAN ZASADNY,
JAMES HOWELL, DIAN SILAS, CARL CHRISTENSEN,
J.ALAN ROBERTSON; SHELLY EDGERTON, SEAN
M. SIEBIGTEROTH, KIM GAEDEKE, VAUGHN HAFNER,
DINA YOUNG, in both their individual and official capacities, and
RAY KISONAS, jointly and severally,
Defendants.

Lesly Pompy
In Pro Per
533 N. Monroe Street
Monroe, MI 48162

Rosati, Schultz, Joppich &
Amtsbuechler, P.C.
S. Randall Field (P31841)
Daniel Klemptner (P68691)
Attorneys for Defendants Blair,
Chaffin, LaSotta, Todd, & Vitale
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Lansing, MI 48917
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**MONROE COUNTY DEFENDANTS ANSWER TO COMPLAINT
WITH AFFIRMATIVE AND OTHER DEFENSES**

NOW COME the Monroe County Defendants and in response to Plaintiff's Complaint state as follows:

I. PLAINTIFFS

1. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

3. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

4. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

5. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

6. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

7. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

8. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

9. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

10. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

11. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

12. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

13. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

14. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

15. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

16. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

17. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

18. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

19. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

20. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

21. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

II. THE DEFENDANTS

22. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

23. Defendants admit she is a magistrate but deny the balance as alleged.

24. Defendants deny as alleged and further state that Magistrate Todd is entitled to absolute immunity.

25. Defendants deny as untrue.

26. Defendants admit she is a magistrate but deny the balance as alleged.

27. Defendants deny as untrue.

28. Defendants deny as untrue.

29. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

30. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

31. Defendants deny as untrue.

32. Defendants state that Robert Blair was assigned to Mantis at the relevant time period.

33. Defendants state that Jon La Sotta was assigned to Mantis at the relevant time period.

34. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

35. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

36. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

37. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

38. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

39. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

40. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

41. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

42. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

43. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

44. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

45. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

46. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

47. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

48. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

49. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

50. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

51. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

52. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

53. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

54. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

55. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

56. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

57. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

58. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

59. Defendants admit as to the Monroe County Defendants.

III. BASIS OF THE CLAIM

60. Defendants deny as untrue.

61. Defendants deny as untrue.

62. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

63. Defendants deny as untrue.

64. Defendants deny as untrue.

65. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

66. Defendants deny as untrue.

67. Defendants deny as untrue.

68. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

69. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

70. Defendants deny as untrue.

71. Defendants deny as untrue.

IV. STATEMENT OF FACTS

72. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

73. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

74. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

75. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

76. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

77. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

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79. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

80. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

81. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

82. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

83. Defendants deny as untrue.

84. Defendants deny as untrue.

85. Defendants deny as untrue.

86. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

87. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

88. Defendants deny as untrue.

89. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

90. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

91. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

92. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

93. (a – d.) Defendants deny as untrue.

94. Defendants deny as untrue.

95. Defendants deny as untrue.

96. Defendants deny as untrue.

97. Defendants deny as untrue.

98. Defendants deny as untrue.

99. Defendants deny as untrue.

100. Defendants deny as untrue.

101. Defendants deny as untrue.

102. Defendants deny as untrue.

103. Defendants deny as untrue.

104. Defendants deny as untrue.

105. Defendants deny as untrue.

106. Defendants deny as untrue.

107. Defendants deny as untrue.

108. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

109. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

110. Defendants deny as untrue.

111. Defendants deny as untrue.

112. Defendants deny as untrue.

113. Defendants deny as untrue.

114. Defendants deny as untrue.

115. Defendants deny as untrue.

116. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

117. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

118. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

119. Defendants deny as untrue.

120. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

121. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

122. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

123. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

124. Defendants deny as untrue.

125. Defendants deny as untrue.

126. Defendants deny as untrue.

127. Defendants deny as untrue.

128. Defendants deny as untrue.

129. Defendants deny as untrue.

130. Defendants deny as untrue.

131. Defendants deny as untrue.

132. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

133. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

134. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

135. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

136. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

137. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

138. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

139. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

140. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

141. Defendants deny as untrue.

142. Defendants deny as untrue.

143. Defendants deny as untrue.

144. Defendants deny as untrue.

145. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

146. Defendants deny as untrue.

147. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

148. (a. – f.) Defendants deny as untrue.

149. Defendants deny as untrue.

150. Defendants deny as untrue.

151. Defendants deny as untrue.

152. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

153. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

154. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

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form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

156. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

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159. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

160. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

161. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

162. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

163. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

164. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

165. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

166. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

167. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

168. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

169. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

170. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

171. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

172. Defendants deny as untrue.

173. Defendants deny as untrue.

174. Defendants deny as untrue.

175. Defendants deny as untrue.

176. Defendants deny as untrue.

177. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

178. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

179. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

180. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

181. Defendants deny as untrue.

182. Defendants deny as untrue.

183. Defendants deny as untrue.

184. Defendants deny as untrue.

185. Defendants deny as untrue.

186. Defendants deny as untrue.

187. Defendants deny as untrue.

188. Defendants deny as untrue.

189. Defendants deny as untrue.

190. Defendants deny as untrue.

191. Defendants deny as untrue.

192. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

193. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

194. Defendants deny as untrue.

195. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

196. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

197. Defendants deny as untrue.

198. Defendants deny as untrue.

199. Defendants deny as untrue.

200. Defendants deny as untrue.

201. Defendants deny as untrue.

202. Defendants deny as untrue.

203. Defendants deny as untrue.

204. Defendants deny as untrue.

205. Defendants deny as untrue.

206. Defendants deny as untrue.

207. Defendants deny as untrue.

208. Defendants deny as untrue.

209. Defendants deny as untrue.

210. Defendants deny as untrue.

211. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

212. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

(a. – d.) Defendants deny as untrue. (e.) Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

213. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

V. PRELIMINARY STATEMENT

215. (sic) Defendants deny as untrue.

216. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

217. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

218. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

219. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

220. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

221. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

222. Defendants deny as untrue.

223. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

224. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

225. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

226. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

227. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

228. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

229. Defendants deny as untrue.

230. Defendants deny as untrue.

231. Defendants deny as untrue.

**VI. ALLEGATIONS AGAINST VAGHN HAFNER
AND DR. LEON PEDELL**

232. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs but deny allegations of false statements.

233. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

234. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

235. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

236. (1 – 12 and i, ii, iii) Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

237. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

238. Defendants deny as untrue.

239. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

240. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

241. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

242. Defendants deny as untrue.

**VI. THE ANTICIPATORY SEARCH WARRANT(S)
HAS NO LEGAL SUPPORT**

243. Defendants deny as untrue.

244. Defendants deny as untrue.

245. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

246. Defendants deny as untrue.

247. Defendants deny as untrue.

248. (A. – C.) Defendants deny as untrue. (D.) Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

249. (1. – 5.) Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

250. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

251. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

252. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

253. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

254. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

255. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

256. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

257. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

258. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

VII. THE STATUTE OF LIMITATIONS WAS TOLLED

259. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

260. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

261. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

262. Defendants deny as untrue.

263. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

264. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

265. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

266. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

267. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

268. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

269. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

270. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

271. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

272. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

273. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

274. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

275. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

276. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

277. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

278. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

279. Defendants deny as untrue.

280. Defendants deny as untrue.

281. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

282. Defendants deny as untrue.

283. Defendants deny as untrue.

**VIII. COMMON ALLEGATIONS AGAINST DISTRICT COURT
MAGISTRATE TINA TODD, MAGISTRATE
JESSICA CHAFFIN, AND JUDGE JACK VITALE**

284. Defendants deny as untrue.

285. Defendants deny as untrue.

286. Defendants deny as untrue. Defendants further state that Magistrate Todd, Magistrate Chaffin and Judge Vitale are entitled to absolute immunity under MCL 691.1407(5) and absolute immunity under federal law.

287. Defendants deny as untrue.

288. Defendants deny as untrue.

289. Defendants deny as untrue.

290. Defendants deny as untrue.

291. Defendants deny as untrue.

292. Defendants deny as untrue as said Defendants are entitled to absolute immunity.

IX. ALLEGATIONS AGAINST MAGISTRATE TINA TODD

293. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

294. Defendants deny as untrue.

295. Defendants deny as untrue.

296. Defendants deny as untrue.

X. ALLEGATIONS AGAINST MAGISTRATE JESSICA CHAFFIN

297. Defendants deny as untrue.

298. Defendants deny as untrue.

299. Defendants deny as untrue.

300. Defendants deny as untrue.

301. Defendants deny as untrue.

302. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

303. Defendants deny as untrue.

304. Defendants deny as untrue.

305. Defendants deny as untrue.

306. Defendants deny as untrue.

307. Defendants deny as untrue.

308. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

309. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

310. Defendants deny as untrue.

311. Defendants deny as untrue.

312. Defendants deny as untrue.

313. Defendants deny as untrue.

314. Defendants deny as untrue.

315. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

316. Defendants deny as untrue.

317. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

318. Defendants deny as untrue.

XI. ALLEGATIONS AGAINST JUDGE JACK VITALE

319. Defendants deny as untrue.

320. Defendants deny as untrue.

321. Defendants deny as untrue.

322. Defendants deny as untrue.

323. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

324. Defendants deny as untrue.

325. Defendants deny as untrue.

326. Defendants deny as untrue.

327. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

328. Defendants deny as untrue.

329. Defendants deny as untrue.

330. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

331. Defendants deny as untrue.

**XIII. COMMON ALLEGATIONS
BLUE CROSS AND BLUE CROSS
COMPLETE VIOLATED PUBLIC POLICY OF THE STATE**

332. Allegations are not as to our named Defendants and no answer is required.

333. (a. – d.) Allegations are not as to our named Defendants and no answer is required.

334. Allegations are not as to our named Defendants and no answer is required.

335. Allegations are not as to our named Defendants and no answer is required.

336. Allegations are not as to our named Defendants and no answer is required.

337. Allegations are not as to our named Defendants and no answer is required.

338. Allegations are not as to our named Defendants and no answer is required.

339. Allegations are not as to our named Defendants and no answer is required.

340. Allegations are not as to our named Defendants and no answer is required.

341. Allegations are not as to our named Defendants and no answer is required.

342. (a. – e.) Allegations are not as to our named Defendants and no answer is required.

XIII. COMMON ALLEGATIONS AGAINST DEFENDANTS BRIAN BISHOP, MARC MOORE, ROBERT BLAIR, SHAWN KOTCH, JOHN LASOTTA, MICHAEL ZSENYUK, JIM GALLAGHER, BRIAN ZASADNY, JAMES HOWELL, DIANE SILAS, CARL CHRISTENSEN, J. ALAN ROBERTSON, SHELLY EDGERTON, SEAN SIEBIGTEROTH, KIM GAEDEKE, AND VAUGH HAFNER

343. Defendants deny as untrue.

344. Defendants deny as untrue.

345. Defendants deny as untrue.

346. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

347. Defendants deny as untrue.

348. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

349. Defendants deny as untrue.

350. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

351. Defendants deny as untrue.

352. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

353. Defendants deny as untrue.

354. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

355. Defendants deny as untrue.

356. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

357. Defendants deny as untrue.

358. Defendants deny as untrue.

359. Defendants deny as untrue.

360. Defendants deny as untrue.

361. Defendants deny as untrue.

362. Defendants deny as untrue.

363. Defendants deny as untrue.

364. Defendants deny as untrue.

365. Defendants deny as untrue.

366. Defendants deny as untrue.

367. Defendants deny as untrue.

368. Defendants deny as untrue.

**XIII. COMMON ALLEGATIONS
AGAINST DEFENDANTS MARC MOORE, ROBERT BLAIR, SHAWN
KOTSCH, JON LASOTTA, BRIAN BISHOP**

369. Defendants deny as untrue.

370. Defendants deny as untrue.

371. Defendants deny as untrue.

372. Defendants deny as untrue.

373. Defendants deny as untrue.

374. (a. – m.) Defendants deny as untrue.

375. Defendants deny as untrue.

376. Defendants deny as untrue.

377. (a. – f.) Defendants deny as untrue.

378. (a. – f.) Defendants deny as untrue.

**XV. FALSE LIGHT CLAIM AGAINST
LT. MARC MOORE AND RAY KISONAS**

379. (a. – c.) Allegations are not as to our named Defendants and no answer is required.

380. Allegations are not as to our named Defendants and no answer is required.

381. Allegations are not as to our named Defendants and no answer is required.

382. Allegations are not as to our named Defendants and no answer is required.

383. Allegations are not as to our named Defendants and no answer is required.

384. Allegations are not as to our named Defendants and no answer is required.

385. Allegations are not as to our named Defendants and no answer is required.

386. Allegations are not as to our named Defendants and no answer is required.

387. Allegations are not as to our named Defendants and no answer is required.

388. Allegations are not as to our named Defendants and no answer is required.

389. Allegations are not as to our named Defendants and no answer is required.

390. Allegations are not as to our named Defendants and no answer is required.

391. Allegations are not as to our named Defendants and no answer is required.

392. Allegations are not as to our named Defendants and no answer is required.

393. Allegations are not as to our named Defendants and no answer is required.

394. Allegations are not as to our named Defendants and no answer is required.

395. Allegations are not as to our named Defendants and no answer is required.

396. Allegations are not as to our named Defendants and no answer is required.

397. Allegations are not as to our named Defendants and no answer is required.

**XVI. BLUE CROSS AND JAMES HOWELL
COMMITTED FRAUDES IN THEIR CRIMINAL
INVESTIGATION OF PLAINTIFFS**

398. Allegations are not as to our named Defendants and no answer is required.

399. (a. – c.) Allegations are not as to our named Defendants and no answer is required.

400. Allegations are not as to our named Defendants and no answer is required.

401. Allegations are not as to our named Defendants and no answer is required.

402. Allegations are not as to our named Defendants and no answer is required.

403. Allegations are not as to our named Defendants and no answer is required.

404. Allegations are not as to our named Defendants and no answer is required.

405. Allegations are not as to our named Defendants and no answer is required.

406. Allegations are not as to our named Defendants and no answer is required.

407. Allegations are not as to our named Defendants and no answer is required.

408. Allegations are not as to our named Defendants and no answer is required.

409. Allegations are not as to our named Defendants and no answer is required. Allegations are not as to our named Defendants and no answer is required.

410. Allegations are not as to our named Defendants and no answer is required.

411. Allegations are not as to our named Defendants and no answer is required.

412. Allegations are not as to our named Defendants and no answer is required.

413. Allegations are not as to our named Defendants and no answer is required.

414. Allegations are not as to our named Defendants and no answer is required.

415. Allegations are not as to our named Defendants and no answer is required.

416. Allegations are not as to our named Defendants and no answer is required.

417. Allegations are not as to our named Defendants and no answer is required.

418. Allegations are not as to our named Defendants and no answer is required.

419. Allegations are not as to our named Defendants and no answer is required.

420. Allegations are not as to our named Defendants and no answer is required.

421. Allegations are not as to our named Defendants and no answer is required.

422. Allegations are not as to our named Defendants and no answer is required.

423. Allegations are not as to our named Defendants and no answer is required.

424. Allegations are not as to our named Defendants and no answer is required.

425. Allegations are not as to our named Defendants and no answer is required.

426. Allegations are not as to our named Defendants and no answer is required.

427. Allegations are not as to our named Defendants and no answer is required.

428. Allegations are not as to our named Defendants and no answer is required.

429. Allegations are not as to our named Defendants and no answer is required.

430. Allegations are not as to our named Defendants and no answer is required.

431. Allegations are not as to our named Defendants and no answer is required.

432. Allegations are not as to our named Defendants and no answer is required.

**XVI. [SIC]BLUE CROSS FRAUDULENTLY SUBSTITUTED ITS 2016
GUIDELINES FOR ITS 2016 ELECTRONIC BILLING SYSTEM**

433. Allegations are not as to our named Defendants and no answer is required.

434. Allegations are not as to our named Defendants and no answer is required.

435. Allegations are not as to our named Defendants and no answer is required.

436. Allegations are not as to our named Defendants and no answer is required.

437. Allegations are not as to our named Defendants and no answer is required.

438. Allegations are not as to our named Defendants and no answer is required.

439. Allegations are not as to our named Defendants and no answer is required.

440. Allegations are not as to our named Defendants and no answer is required.

441. Allegations are not as to our named Defendants and no answer is required.

442. Allegations are not as to our named Defendants and no answer is required.

443. Allegations are not as to our named Defendants and no answer is required.

444. Allegations are not as to our named Defendants and no answer is required.

445. Allegations are not as to our named Defendants and no answer is required.

446. Allegations are not as to our named Defendants and no answer is required.

447. (a. – b.) Allegations are not as to our named Defendants and no answer is required.

448. Allegations are not as to our named Defendants and no answer is required.

449. Allegations are not as to our named Defendants and no answer is required.

450. Allegations are not as to our named Defendants and no answer is required.

451. Allegations are not as to our named Defendants and no answer is required.

452. Allegations are not as to our named Defendants and no answer is required.

453. Allegations are not as to our named Defendants and no answer is required.

454. Allegations are not as to our named Defendants and no answer is required.

455. Allegations are not as to our named Defendants and no answer is required.

456. Allegations are not as to our named Defendants and no answer is required.

XVIII. BLUE CROSS BREACHED ITS CONTRACTUAL AGREEMENT TO SUPPORT ITS POTENTIAL FELONY CHARGES AGAINST PLAINTIFFS

457. Allegations are not as to our named Defendants and no answer is required.

458. Allegations are not as to our named Defendants and no answer is required.

459. Allegations are not as to our named Defendants and no answer is required.

460. Allegations are not as to our named Defendants and no answer is required.

461. Allegations are not as to our named Defendants and no answer is required.

462. Allegations are not as to our named Defendants and no answer is required.

463. Allegations are not as to our named Defendants and no answer is required.

464. Allegations are not as to our named Defendants and no answer is required.

465. Allegations are not as to our named Defendants and no answer is required.

466. Allegations are not as to our named Defendants and no answer is required.

467. Allegations are not as to our named Defendants and no answer is required.

468. Allegations are not as to our named Defendants and no answer is required.

469. Allegations are not as to our named Defendants and no answer is required.

470. Allegations are not as to our named Defendants and no answer is required.

471. Allegations are not as to our named Defendants and no answer is required.

472. Allegations are not as to our named Defendants and no answer is required.

473. Allegations are not as to our named Defendants and no answer is required.

474. Allegations are not as to our named Defendants and no answer is required.

475. Allegations are not as to our named Defendants and no answer is required.

476. Allegations are not as to our named Defendants and no answer is required.

477. Allegations are not as to our named Defendants and no answer is required.

478. Allegations are not as to our named Defendants and no answer is required.

479. Allegations are not as to our named Defendants and no answer is required.

480. Allegations are not as to our named Defendants and no answer is required.

481. Allegations are not as to our named Defendants and no answer is required.

482. (a. – c.) Allegations are not as to our named Defendants and no answer is required.

483. Allegations are not as to our named Defendants and no answer is required.

**XIX. BLUE CROSS UNVERIFIED PRESCRIBER
BLOCK MALICIOUSLY CHANGED DR. POMPY PAIN MANAGEMENT
PEER GROUP TO AN INNACURATE ANESTHESIOLOGY
PEER GROUP COMPARISON IN SUPPORT
OF ITS POTENTIAL FELONY CHARGES AGAINST DR. POMPY**

484. Allegations are not as to our named Defendants and no answer is required.

485. Allegations are not as to our named Defendants and no answer is required.

486. Allegations are not as to our named Defendants and no answer is required.

487. Allegations are not as to our named Defendants and no answer is required.

488. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

489. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

490. Allegations are not as to our named Defendants and no answer is required.

491. Allegations are not as to our named Defendants and no answer is required.

492. Allegations are not as to our named Defendants and no answer is required.

493. Allegations are not as to our named Defendants and no answer is required.

494. Defendants deny as untrue.

495. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

496. Allegations are not as to our named Defendants and no answer is required.

497. Allegations are not as to our named Defendants and no answer is required.

498. Allegations are not as to our named Defendants and no answer is required.

499. Allegations are not as to our named Defendants and no answer is required.

500. Allegations are not as to our named Defendants and no answer is required.

501. Allegations are not as to our named Defendants and no answer is required.

502. Allegations are not as to our named Defendants and no answer is required.

503. Allegations are not as to our named Defendants and no answer is required.

504. (1. – 4.) Allegations are not as to our named Defendants and no answer is required.

505. Allegations are not as to our named Defendants and no answer is required.

XX. BLUE CROSS VIOLATED ITS OWN PRACTITIONER AGREEMENT FOR PURPOSE OF ITS POTENTIAL FELONY CHARGES AGAINST PLAINTIFFS

506. (a. – f.) Allegations are not as to our named Defendants and no answer is required.

XXI. BLUE CROSS FAILED TO COMPLY WITH ITS OWN MANUAL RECOMMENDATIONS FOR PURPOSE OF ITS FELONY CHARGES AGAINST DR. POMPY

507. (A. – J) Allegations are not as to our named Defendants and no answer is required.

XXII. ALLEGATIONS AGAINST DR. CARL CHRISTENSEN

508. Allegations are not as to our named Defendants and no answer is required.

509. Allegations are not as to our named Defendants and no answer is required.

510. Allegations are not as to our named Defendants and no answer is required.

511. Allegations are not as to our named Defendants and no answer is required.

512. Allegations are not as to our named Defendants and no answer is required.

513. Allegations are not as to our named Defendants and no answer is required.

514. Allegations are not as to our named Defendants and no answer is required.

515. Allegations are not as to our named Defendants and no answer is required.

516. Allegations are not as to our named Defendants and no answer is required.

517. Allegations are not as to our named Defendants and no answer is required.

518. Allegations are not as to our named Defendants and no answer is required.

519. Allegations are not as to our named Defendants and no answer is required.

520. Allegations are not as to our named Defendants and no answer is required.

521. Allegations are not as to our named Defendants and no answer is required.

522. Allegations are not as to our named Defendants and no answer is required.

523. Defendants deny as untrue.

524. Defendants deny as untrue.

525. Allegations are not as to our named Defendants and no answer is required.

526. Allegations are not as to our named Defendants and no answer is required.

527. Allegations are not as to our named Defendants and no answer is required.

528. Allegations are not as to our named Defendants and no answer is required.

529. Allegations are not as to our named Defendants and no answer is required.

XXIII. ALLEGATIONS AGAINST DR. J. ALLAN ROBERTSON

530. Allegations are not as to our named Defendants and no answer is required.

531. Allegations are not as to our named Defendants and no answer is required.

532. Allegations are not as to our named Defendants and no answer is required.

533. Allegations are not as to our named Defendants and no answer is required.

534. Allegations are not as to our named Defendants and no answer is required.

535. Allegations are not as to our named Defendants and no answer is required.

536. Allegations are not as to our named Defendants and no answer is required.

537. Allegations are not as to our named Defendants and no answer is required.

XXIV. ALLEGATIONS AGAINST BANK OF MONROE AND TRUST

538. Defendants deny as untrue.

539. Defendants admit.

540. Defendants deny as untrue.

541. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

542. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

543. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

544. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

545. Allegations are not as to our named Defendants and no answer is required.

546. (1. – 2.) Allegations are not as to our named Defendants and no answer is required.

547. (1. – 4.) Allegations are not as to our named Defendants and no answer is required.

548. Allegations are not as to our named Defendants and no answer is required.

549. Allegations are not as to our named Defendants and no answer is required.

550. Allegations are not as to our named Defendants and no answer is required.

551. Allegations are not as to our named Defendants and no answer is required.

552. Allegations are not as to our named Defendants and no answer is required.

553. Allegations are not as to our named Defendants and no answer is required.

554. Allegations are not as to our named Defendants and no answer is required.

555. Allegations are not as to our named Defendants and no answer is required.

556. Allegations are not as to our named Defendants and no answer is required.

557. Allegations are not as to our named Defendants and no answer is required.

558. Allegations are not as to our named Defendants and no answer is required.

559. Allegations are not as to our named Defendants and no answer is required.

560. Allegations are not as to our named Defendants and no answer is required.

561. Allegations are not as to our named Defendants and no answer is required.

XXV. ALLEGATIONS AGAINST DEFENDANT ROBERT BLAIR

562. Defendants deny as untrue.

563. Defendants deny as untrue.

564. Defendants deny as untrue.

565. Defendants deny as untrue.

566. Defendants deny as untrue.

567. Defendants deny as untrue.

568. Defendants deny as untrue.

569. Defendants deny as untrue.

570. Defendants deny as untrue.

571. Defendants deny as untrue.

572. Defendants deny as untrue.

573. Defendants deny as untrue.

574. Defendants deny as untrue.

575. Defendants deny as untrue.

XXVI. ALLEGATIONS AGAINST DEA AGENT BRIAN BISHOP

576. Allegations are not as to our named Defendants and no answer is required.

577. Allegations are not as to our named Defendants and no answer is required.

578. Allegations are not as to our named Defendants and no answer is required.

579. Allegations are not as to our named Defendants and no answer is required.

580. Allegations are not as to our named Defendants and no answer is required.

581. Allegations are not as to our named Defendants and no answer is required.

582. Allegations are not as to our named Defendants and no answer is required.

583. Allegations are not as to our named Defendants and no answer is required.

584. Allegations are not as to our named Defendants and no answer is required.

585. Allegations are not as to our named Defendants and no answer is required.

586. Allegations are not as to our named Defendants and no answer is required.

587. Allegations are not as to our named Defendants and no answer is required.

588. Allegations are not as to our named Defendants and no answer is required.

589. Allegations are not as to our named Defendants and no answer is required.

590. Allegations are not as to our named Defendants and no answer is required.

591. Allegations are not as to our named Defendants and no answer is required.

592. Allegations are not as to our named Defendants and no answer is required.

593. Allegations are not as to our named Defendants and no answer is required.

XXVII. ALLEGATIONS AGAINST OFFICE JON LASOTTA

594. Defendants deny as untrue.

595. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

596. Defendants deny as untrue.

597. Defendants deny as untrue.

598. Defendants deny as untrue.

599. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

600. (a. – c.) Defendants deny as untrue.

601. (a. – c.) Defendants deny as untrue.

602. Defendants deny as untrue.

603. Defendants deny as untrue.

604. Defendants deny as untrue.

XXVIII. ALLEGATIONS AGAINST OFFICER SHAWN KOTSCH

605. Allegations are not as to our named Defendants and no answer is required.

606. Allegations are not as to our named Defendants and no answer is required.

607. (a. – c.) Allegations are not as to our named Defendants and no answer is required.

608. Allegations are not as to our named Defendants and no answer is required.

609. Allegations are not as to our named Defendants and no answer is required.

610. Allegations are not as to our named Defendants and no answer is required.

**COMMON ALLEGATIONS AGAINST SHELLY EDGERTON, KIM
GAEDERE, SEAN M. SIEBIGTEROTH**

611. Allegations are not as to our named Defendants and no answer is required.

612. Allegations are not as to our named Defendants and no answer is required.

613. Allegations are not as to our named Defendants and no answer is required.

614. Allegations are not as to our named Defendants and no answer is required.

615. Allegations are not as to our named Defendants and no answer is required.

616. (1. – 16.) Allegations are not as to our named Defendants and no answer is required.

617. Allegations are not as to our named Defendants and no answer is required.

618. Allegations are not as to our named Defendants and no answer is required.

619. Allegations are not as to our named Defendants and no answer is required.

620. Allegations are not as to our named Defendants and no answer is required.

621. Allegations are not as to our named Defendants and no answer is required.

622. Allegations are not as to our named Defendants and no answer is required.

623. Allegations are not as to our named Defendants and no answer is required.

624. Allegations are not as to our named Defendants and no answer is required.

625. Allegations are not as to our named Defendants and no answer is required.

626. Allegations are not as to our named Defendants and no answer is required.

627. Allegations are not as to our named Defendants and no answer is required.

628. Allegations are not as to our named Defendants and no answer is required.

629. Allegations are not as to our named Defendants and no answer is required.

630. Allegations are not as to our named Defendants and no answer is required.

631. Allegations are not as to our named Defendants and no answer is required.

632. Allegations are not as to our named Defendants and no answer is required.

633. Allegations are not as to our named Defendants and no answer is required.

634. Allegations are not as to our named Defendants and no answer is required.

635. Allegations are not as to our named Defendants and no answer is required.

636. Allegations are not as to our named Defendants and no answer is required.

XXX
ALLEGATIONS AGAINST VAUGHN HAFNER, R.PH

637. Allegations are not as to our named Defendants and no answer is required.

638. Allegations are not as to our named Defendants and no answer is required.

639. Allegations are not as to our named Defendants and no answer is required.

640. Allegations are not as to our named Defendants and no answer is required.

641. Allegations are not as to our named Defendants and no answer is required.

642. Allegations are not as to our named Defendants and no answer is required.

643. Allegations are not as to our named Defendants and no answer is required.

644. Allegations are not as to our named Defendants and no answer is required.

645. Allegations are not as to our named Defendants and no answer is required.

646. Allegations are not as to our named Defendants and no answer is required.

647. Allegations are not as to our named Defendants and no answer is required.

648. Allegations are not as to our named Defendants and no answer is required.

649. Allegations are not as to our named Defendants and no answer is required.

650. Allegations are not as to our named Defendants and no answer is required.

651. Allegations are not as to our named Defendants and no answer is required.

652. Allegations are not as to our named Defendants and no answer is required.

653. Allegations are not as to our named Defendants and no answer is required.

654. Allegations are not as to our named Defendants and no answer is required.

655. Allegations are not as to our named Defendants and no answer is required.

656. Allegations are not as to our named Defendants and no answer is required.

657. Allegations are not as to our named Defendants and no answer is required.

658. Allegations are not as to our named Defendants and no answer is required.

659. Allegations are not as to our named Defendants and no answer is required.

660. Allegations are not as to our named Defendants and no answer is required.

661. Allegations are not as to our named Defendants and no answer is required.

662. Allegations are not as to our named Defendants and no answer is required.

663. Allegations are not as to our named Defendants and no answer is required.

664. Allegations are not as to our named Defendants and no answer is required.

665. Allegations are not as to our named Defendants and no answer is required.

666. Allegations are not as to our named Defendants and no answer is required.

667. Allegations are not as to our named Defendants and no answer is required.

668. Allegations are not as to our named Defendants and no answer is required.

669. Allegations are not as to our named Defendants and no answer is required.

670. Allegations are not as to our named Defendants and no answer is required.

671. (1. – 6.)Allegations are not as to our named Defendants and no answer is required.

672. Allegations are not as to our named Defendants and no answer is required.

673. Allegations are not as to our named Defendants and no answer is required.

XXXI. THE COUNTS

674. Defendants hereby incorporate by reference each and every answer to Paragraphs 1-673 above, as though fully set forth herein.

675. (a. – c.) Defendants deny as untrue. (d. – e.) Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

COUNT 1 MAGISTRATE TINA TODD DEPARTED FROM HER JUDICIAL ROLE

676. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 675 above, as though fully set forth herein.

677. Defendants deny as untrue.

678. Defendants deny as untrue.

679. Defendants deny as untrue.

680. Defendants deny as untrue.

681. Defendants deny as untrue.

682. Defendants deny as untrue.

683. Defendants deny as untrue.

684. Defendants deny as untrue.

685. Defendants deny as untrue.

686. Defendants deny as untrue.

687. Defendants deny as untrue.

688. Defendants deny as untrue.

689. Defendants deny as untrue.

690. Defendants deny as untrue.

COUNT 2
MAGISTRATE JESSICA CHAFFIN
DEPARTED FROM HER JUDICIAL ROLE

691. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 690 above, as though fully set forth herein.

692. Defendants deny as untrue.

- 693. Defendants deny as untrue.
- 694. Defendants deny as untrue.
- 695. Defendants deny as untrue.
- 696. Defendants deny as untrue.
- 697. Defendants deny as untrue.
- 698. Defendants deny as untrue.
- 699. Defendants deny as untrue.
- 700. Defendants deny as untrue.
- 701. Defendants deny as untrue.
- 702. Defendants deny as untrue.
- 703. Defendants deny as untrue.
- 704. Defendants deny as untrue.
- 705. Defendants deny as untrue.
- 706. Defendants deny as untrue.
- 707. Defendants deny as untrue.
- 708. Defendants deny as untrue.
- 709. Defendants deny as untrue.
- 710. Defendants deny as untrue.
- 711. Defendants deny as untrue.

712. Defendants deny as untrue.

COUNT 3
JUDGE JACK VITALE DEPARTED FROM HIS JUDICIAL ROLE

713. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 712 above, as though fully set forth herein.

714. Defendants deny as untrue.

715. Defendants deny as untrue.

716. Defendants deny as untrue.

717. Defendants deny as untrue.

718. Defendants deny as untrue.

719. Defendants deny as untrue.

720. Defendants deny as untrue.

721. Defendants deny as untrue.

722. Defendants deny as untrue.

723. Defendants deny as untrue.

724. Defendants deny as untrue.

725. Defendants deny as untrue.

726. Defendants deny as untrue.

727. Defendants deny as untrue.

728. Defendants deny as untrue.

729. Defendants deny as untrue.

730. Defendants deny as untrue.

731. Defendants deny as untrue.

COUNT 4
LT. MARC MOORE VIOLATED DR. POMPY
4TH AND 14TH AMENDMENTS RIGHTS

732. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 731 above, as though fully set forth herein.

733. Allegations are not as to our named Defendants and no answer is required.

734. Allegations are not as to our named Defendants and no answer is required.

735. Allegations are not as to our named Defendants and no answer is required.

736. Allegations are not as to our named Defendants and no answer is required.

737. Allegations are not as to our named Defendants and no answer is required.

738. Allegations are not as to our named Defendants and no answer is required.

739. Allegations are not as to our named Defendants and no answer is required.

740. Allegations are not as to our named Defendants and no answer is required.

741. Allegations are not as to our named Defendants and no answer is required.

742. Allegations are not as to our named Defendants and no answer is required.

743. Allegations are not as to our named Defendants and no answer is required.

COUNT 5

DR. POMPY HAS A FIRST AMENDMENT RETALIATION CLAIM AGAINST OFFICER MARC MOORE, DEA AGENT BRIAN BISHOP, OFFICER ROBERT BLAIR, AND OFFICER SHAWN KOTCH

744. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 743 above, as though fully set forth herein.

745. Defendants deny as untrue.

746. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

747. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

748. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

749. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

750. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

751. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

752. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

753. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

754. Defendants deny as untrue.

755. Defendants deny as untrue.

756. Defendants deny as untrue.

757. Defendants deny as untrue.

758. Defendants deny as untrue.

759. Defendants deny as untrue.

760. Defendants deny as untrue.

761. Defendants deny as untrue.

762. Defendants deny as untrue.

COUNT 6
LT. MARC MOORE, AGENT BRIAN BISHOP,
OFFICER ROBERT BLAIR, AND OFFICER SHAWN KOTCH
USED EXCESSIVE FORCE DURING THE SEARCHES

763. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 762 above, as though fully set forth herein.

764. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

765. Defendants deny as untrue.

766. Defendants deny as untrue.

767. Defendants deny as untrue.

768. Defendants deny as untrue.

769. Defendants deny as untrue.

770. Defendants deny as untrue.

771. Defendants deny as untrue.

772. Defendants deny as untrue.

773. Defendants deny as untrue.

774. Defendants deny as untrue.

775. Defendants deny as untrue.

776. Defendants deny as untrue.

777. Defendants deny as untrue.

778. Defendants deny as untrue.

779. Defendants deny as untrue.

780. Defendants deny as untrue.

COUNT 7
OFFICER MOORE, AGENT BISHOP, OFFICER KOTCH
ILLEGALLY DETAINED DR. POMPY DURING SEARCHES

781. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 780 above, as though fully set forth herein.

782. Allegations are not as to our named Defendants and no answer is required.

783. Allegations are not as to our named Defendants and no answer is required.

784. Allegations are not as to our named Defendants and no answer is required.

785. Allegations are not as to our named Defendants and no answer is required.

786. Allegations are not as to our named Defendants and no answer is required.

787. Defendants deny as untrue.

788. Defendants deny as untrue.

789. Allegations are not as to our named Defendants and no answer is required.

790. Allegations are not as to our named Defendants and no answer is required.

791. Allegations are not as to our named Defendants and no answer is required.

792. Allegations are not as to our named Defendants and no answer is required.

793. Allegations are not as to our named Defendants and no answer is required.

794. Allegations are not as to our named Defendants and no answer is required.

COUNT 8
THE CONDUCT OF LT. MARC MOORE IS TENTAMOUNT TO CRUEL
AND UNUSUAL TREATMENT, ASSAULT, AND BATTERY

795. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 794 above, as though fully set forth herein.

796. Allegations are not as to our named Defendants and no answer is required.

797. Allegations are not as to our named Defendants and no answer is required.

798. Allegations are not as to our named Defendants and no answer is required.

799. Allegations are not as to our named Defendants and no answer is required.

800. Allegations are not as to our named Defendants and no answer is required.

801. Allegations are not as to our named Defendants and no answer is required.

802. Allegations are not as to our named Defendants and no answer is required.

803. Allegations are not as to our named Defendants and no answer is required.

804. Allegations are not as to our named Defendants and no answer is required.

805. Allegations are not as to our named Defendants and no answer is required.

806. Allegations are not as to our named Defendants and no answer is required.

807. Allegations are not as to our named Defendants and no answer is required.

808. Allegations are not as to our named Defendants and no answer is required.

809. Allegations are not as to our named Defendants and no answer is required.

810. Allegations are not as to our named Defendants and no answer is required.

811. Allegations are not as to our named Defendants and no answer is required.

812. Allegations are not as to our named Defendants and no answer is required.

813. Allegations are not as to our named Defendants and no answer is required.

COUNT 9
LT. MARC MOORE, DI BRIAN BISHOP,
OFFICER SHAWN KOTSCH VIOLATED DR. POMPY
SIXTH AMENDMENT RIGHT TO AN ATTORNEY

814. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 813 above, as though fully set forth herein.

815. Allegations are not as to our named Defendants and no answer is required.

816. Allegations are not as to our named Defendants and no answer is required.

817. Allegations are not as to our named Defendants and no answer is required.

818. Allegations are not as to our named Defendants and no answer is required.

819. Allegations are not as to our named Defendants and no answer is required.

820. Allegations are not as to our named Defendants and no answer is required.

821. Allegations are not as to our named Defendants and no answer is required.

822. Allegations are not as to our named Defendants and no answer is required.

823. Allegations are not as to our named Defendants and no answer is required.

824. Allegations are not as to our named Defendants and no answer is required.

825. Allegations are not as to our named Defendants and no answer is required.

826. Allegations are not as to our named Defendants and no answer is required.

827. Allegations are not as to our named Defendants and no answer is required.

828. Allegations are not as to our named Defendants and no answer is required.

COUNT 10
DR. POMPY WAS PROTECTED AGAINST
SELF-INCRIMINATION UNDER THE
FIFTH AMENDMENT PRIVILEGE

829. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 828 above, as though fully set forth herein.

830. Allegations are not as to our named Defendants and no answer is required.

831. Allegations are not as to our named Defendants and no answer is required.

832. Allegations are not as to our named Defendants and no answer is required.

833. Allegations are not as to our named Defendants and no answer is required.

834. Allegations are not as to our named Defendants and no answer is required.

835. Allegations are not as to our named Defendants and no answer is required.

836. Allegations are not as to our named Defendants and no answer is required.

837. Allegations are not as to our named Defendants and no answer is required.

838. Allegations are not as to our named Defendants and no answer is required.

839. Allegations are not as to our named Defendants and no answer is required.

840. Allegations are not as to our named Defendants and no answer is required.

COUNT 11

LT. MOORE, AGENT BISHOP, OFFICER KOTCH VIOLATED DR. POMPY RIGHTS UNDER THE 4TH AMENDMENT PROTECTING HIM AGAINST FALSE ARREST AND IMPRISONMENT

841. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 840 above, as though fully set forth herein.

842. Allegations are not as to our named Defendants and no answer is required.

843. Allegations are not as to our named Defendants and no answer is required.

844. Allegations are not as to our named Defendants and no answer is required.

845. Allegations are not as to our named Defendants and no answer is required.

846. Allegations are not as to our named Defendants and no answer is required.

847. Allegations are not as to our named Defendants and no answer is required.

848. Allegations are not as to our named Defendants and no answer is required.

849. Allegations are not as to our named Defendants and no answer is required.

850. Allegations are not as to our named Defendants and no answer is required.

851. Allegations are not as to our named Defendants and no answer is required.

852. Allegations are not as to our named Defendants and no answer is required.

853. Allegations are not as to our named Defendants and no answer is required.

854. Allegations are not as to our named Defendants and no answer is required.

855. Allegations are not as to our named Defendants and no answer is required.

COUNT 12
DR. POMPY WAS PROTECTED ON SEPTEMBER 26, 2016
UNDER THE FOURTH AMENDMENT PROHIBITING
UNREASONABLE SEARCHES AND SEIZURES

856. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 855 above, as though fully set forth herein.

857. Defendants deny as untrue.

858. Defendants deny as untrue.

859. Defendants deny as untrue.

860. Defendants deny as untrue.

861. Defendants deny as untrue.

862. Defendants deny as untrue.

863. Defendants deny as untrue.

864. Defendants deny as untrue.

865. Defendants deny as untrue.

866. Defendants deny as untrue.

867. Defendants deny as untrue.

868. Defendants deny as untrue.

869. Defendants deny as untrue.

COUNT 13

**LT MARC MOORE, AGENT BRIAN BISHOP, OFFICER ROBERT BLAIR,
OFFICER SHAWN KOTSCH OBTAINED, DISCLOSED, AND
REDISCLOSED UNAUTHORIZED MEDICAL RECORDS**

870. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 869 above, as though fully set forth herein.

871. Defendants deny as untrue.

872. Defendants deny as untrue.

873. (a. – e.) Defendants deny as untrue.

874. Defendants deny as untrue.

875. Defendants deny as untrue.

876. Defendants deny as untrue.

877. Defendants deny as untrue.

878. Defendants deny as untrue.

879. Defendants deny as untrue.

880. Defendants deny as untrue.

881. Defendants deny as untrue.

COUNT 14

DR. POMPY WAS CONTINUOUSLY BULLIED BY LT. MARC MOORE

882. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 881 above, as though fully set forth herein.

883. Allegations are not as to our named Defendants and no answer is required.

884. Allegations are not as to our named Defendants and no answer is required.

885. Allegations are not as to our named Defendants and no answer is required.

886. Allegations are not as to our named Defendants and no answer is required.

887. Allegations are not as to our named Defendants and no answer is required.

888. Allegations are not as to our named Defendants and no answer is required.

889. Allegations are not as to our named Defendants and no answer is required.

890. Allegations are not as to our named Defendants and no answer is required.

891. Allegations are not as to our named Defendants and no answer is required.

892. Allegations are not as to our named Defendants and no answer

is required.

893. Allegations are not as to our named Defendants and no answer is required.

894. Allegations are not as to our named Defendants and no answer is required.

COUNT 15
AGENT BRIAN BISHOP FAILED TO GIVE NOTICE AFTER THE RAID

895. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 894 above, as though fully set forth herein.

896. Allegations are not as to our named Defendants and no answer is required.

897. Allegations are not as to our named Defendants and no answer is required.

898. Allegations are not as to our named Defendants and no answer is required.

899. Allegations are not as to our named Defendants and no answer is required.

900. Allegations are not as to our named Defendants and no answer is required.

901. Allegations are not as to our named Defendants and no answer is required.

902. Allegations are not as to our named Defendants and no answer is required.

903. Allegations are not as to our named Defendants and no answer is required.

904. Allegations are not as to our named Defendants and no answer is required.

905. Allegations are not as to our named Defendants and no answer is required.

906. Allegations are not as to our named Defendants and no answer is required.

907. Allegations are not as to our named Defendants and no answer is required.

908. Allegations are not as to our named Defendants and no answer is required.

909. Allegations are not as to our named Defendants and no answer is required.

910. Allegations are not as to our named Defendants and no answer is required.

COUNT 16
LT. MARC MOORE, AGENT BRIAN BISHOP,
OFFICER SHAWN KOTSCH FALSELY ARRESTED
DR. POMPY AND DENIED HIM RIGHT TO COUNSEL

911. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 910 above, as though fully set forth herein.

912. Allegations are not as to our named Defendants and no answer is required.

913. Allegations are not as to our named Defendants and no answer is required.

914. Allegations are not as to our named Defendants and no answer is required.

915. Allegations are not as to our named Defendants and no answer is required.

916. Allegations are not as to our named Defendants and no answer is required.

917. Allegations are not as to our named Defendants and no answer is required.

918. Allegations are not as to our named Defendants and no answer is required.

919. Allegations are not as to our named Defendants and no answer is required.

920. Allegations are not as to our named Defendants and no answer is required.

921. Allegations are not as to our named Defendants and no answer is required.

922. Allegations are not as to our named Defendants and no answer is required.

923. Allegations are not as to our named Defendants and no answer is required.

924. Allegations are not as to our named Defendants and no answer is required.

925. Allegations are not as to our named Defendants and no answer is required.

926. Allegations are not as to our named Defendants and no answer is required.

927. Allegations are not as to our named Defendants and no answer is required.

928. Allegations are not as to our named Defendants and no answer is required.

929. Allegations are not as to our named Defendants and no answer is required.

930. Allegations are not as to our named Defendants and no answer is required.

931. Allegations are not as to our named Defendants and no answer is required.

COUNT 17
AGENT BRIAN BISHOP VIOLATED THE CONFIDENTIALITY OF
MEDICAL RECORDS, PATIENTS IDENTITIES, AND MAPS REPORTS

932. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 931 above, as though fully set forth herein.

933. Allegations are not as to our named Defendants and no answer is required.

934. Allegations are not as to our named Defendants and no answer is required.

935. Allegations are not as to our named Defendants and no answer is required.

936. Allegations are not as to our named Defendants and no answer is required.

937. Allegations are not as to our named Defendants and no answer is required.

938. Allegations are not as to our named Defendants and no answer is required.

939. Defendants deny as untrue.

940. Allegations are not as to our named Defendants and no answer is required.

941. Allegations are not as to our named Defendants and no answer is required.

942. Allegations are not as to our named Defendants and no answer is required.

943. Allegations are not as to our named Defendants and no answer is required.

944. (A. – I.) Allegations are not as to our named Defendants and no answer is required.

945. Allegations are not as to our named Defendants and no answer is required.

946. Allegations are not as to our named Defendants and no answer is required.

947. Allegations are not as to our named Defendants and no answer is required.

948. Allegations are not as to our named Defendants and no answer is required.

949. Allegations are not as to our named Defendants and no answer is required.

950. Allegations are not as to our named Defendants and no answer is required.

951. Allegations are not as to our named Defendants and no answer is required.

952. Allegations are not as to our named Defendants and no answer is required.

COUNT 18
AGENT BRIAN BISHOP COMMITTED FRAUD
AND VIOLATION OF PRIVACY ON SEPTEMBER 26, 2016

953. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 952 above, as though fully set forth herein.

954. Allegations are not as to our named Defendants and no answer is required.

955. Allegations are not as to our named Defendants and no answer is required.

956. Allegations are not as to our named Defendants and no answer is required.

957. Allegations are not as to our named Defendants and no answer is required.

958. Allegations are not as to our named Defendants and no answer is required.

959. Allegations are not as to our named Defendants and no answer is required.

960. Allegations are not as to our named Defendants and no answer is required.

961. Allegations are not as to our named Defendants and no answer is required.

962. Allegations are not as to our named Defendants and no answer is required.

963. Allegations are not as to our named Defendants and no answer is required.

COUNT 19
OFFICER JON LASOTTA VIOLATED THE
CONFIDENTIALITY OF MEDICAL RECORDS

964. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 963 above, as though fully set forth herein.

965. Defendants deny as untrue.

966. Defendants deny as untrue.

967. Defendants deny as untrue.

968. Defendants deny as untrue.

969. Defendants deny as untrue.

970. Defendants deny as untrue.

971. Defendants deny as untrue.

972. Defendants deny as untrue.

973. Defendants deny as untrue.

974. Defendants deny as untrue.

975. Defendants deny as untrue.

976. Defendants deny as untrue.

977. Defendants deny as untrue.

978. Defendants deny as untrue.

979. Defendants deny as untrue.

980. Defendants deny as untrue.

981. Defendants deny as untrue.

COUNT 20

**LT. MARC MOORE, AGENT BRIAN BISHOP, AND OFFICER SHAWN
KOTSCH VIOLATED DR. POMPY RIGHTS TO COUNSEL**

982. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 981 above, as though fully set forth herein.

983. Allegations are not as to our named Defendants and no answer is required.

984. Allegations are not as to our named Defendants and no answer is required.

985. Allegations are not as to our named Defendants and no answer is required.

986. Allegations are not as to our named Defendants and no answer is required.

987. Allegations are not as to our named Defendants and no answer is required.

988. Allegations are not as to our named Defendants and no answer is required.

989. Allegations are not as to our named Defendants and no answer is required.

990. Allegations are not as to our named Defendants and no answer is required.

991. Allegations are not as to our named Defendants and no answer is required.

992. Allegations are not as to our named Defendants and no answer is required.

993. Allegations are not as to our named Defendants and no answer is required.

994. Allegations are not as to our named Defendants and no answer is required.

995. Allegations are not as to our named Defendants and no answer is required.

996. Allegations are not as to our named Defendants and no answer is required.

997. Allegations are not as to our named Defendants and no answer is required.

998. Allegations are not as to our named Defendants and no answer is required.

999. Allegations are not as to our named Defendants and no answer is required.

COUNT 21
BLUE CROSS BREACHED ITS CONTRACT WITH PLAINTIFFS

1000. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 999 above, as though fully set forth herein.

1001. Allegations are not as to our named Defendants and no answer is required.

1002. Allegations are not as to our named Defendants and no answer is required.

1003. Allegations are not as to our named Defendants and no answer is required.

1004. Allegations are not as to our named Defendants and no answer is required.

1005. Allegations are not as to our named Defendants and no answer is required.

1006. Allegations are not as to our named Defendants and no answer is required.

1007. Allegations are not as to our named Defendants and no answer is required.

1008. Allegations are not as to our named Defendants and no answer is required.

1009. Allegations are not as to our named Defendants and no answer is required.

1010. Allegations are not as to our named Defendants and no answer is required.

1011. Allegations are not as to our named Defendants and no answer is required.

1012. Allegations are not as to our named Defendants and no answer is required.

1013. Allegations are not as to our named Defendants and no answer is required.

1014. Allegations are not as to our named Defendants and no answer is required.

1015. Allegations are not as to our named Defendants and no answer is required.

1016. Allegations are not as to our named Defendants and no answer is required.

1017. Allegations are not as to our named Defendants and no answer is required.

1018. Allegations are not as to our named Defendants and no answer is required.

1019. Allegations are not as to our named Defendants and no answer is required.

1020. Allegations are not as to our named Defendants and no answer is required.

1021. Allegations are not as to our named Defendants and no answer is required.

1022. Allegations are not as to our named Defendants and no answer is required.

1023. Allegations are not as to our named Defendants and no answer is required.

1024. Allegations are not as to our named Defendants and no answer is required.

1025. Allegations are not as to our named Defendants and no answer is required.

1026. Allegations are not as to our named Defendants and no answer is required.

1027. Allegations are not as to our named Defendants and no answer is required.

1028. Allegations are not as to our named Defendants and no answer is required.

1029. Allegations are not as to our named Defendants and no answer is required.

1030. Allegations are not as to our named Defendants and no answer is required.

1031. Allegations are not as to our named Defendants and no answer is required.

1032. Allegations are not as to our named Defendants and no answer is required.

1033. Allegations are not as to our named Defendants and no answer is required.

1034. Allegations are not as to our named Defendants and no answer is required.

1035. Allegations are not as to our named Defendants and no answer is required.

1036. Allegations are not as to our named Defendants and no answer is required.

1037. Allegations are not as to our named Defendants and no answer is required.

1038. Allegations are not as to our named Defendants and no answer is required.

1039. Allegations are not as to our named Defendants and no answer is required.

COUNT 22
BLUE CROSS BRACHED PLAINTIFFS IMPLIED CONTRACTS

1040. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 1039 above, as though fully set forth herein.

1041. Allegations are not as to our named Defendants and no answer is required.

1042. Allegations are not as to our named Defendants and no answer is required.

1043. Allegations are not as to our named Defendants and no answer is required.

1044. Allegations are not as to our named Defendants and no answer is required.

1045. Allegations are not as to our named Defendants and no answer is required.

1046. Allegations are not as to our named Defendants and no answer is required.

1047. (1. – 5.) Allegations are not as to our named Defendants and no answer is required.

1048. Allegations are not as to our named Defendants and no answer is required.

1049. Allegations are not as to our named Defendants and no answer is required.

1050. Allegations are not as to our named Defendants and no answer is required.

1051. Allegations are not as to our named Defendants and no answer is required.

1052. Allegations are not as to our named Defendants and no answer is required.

1053. Allegations are not as to our named Defendants and no answer is required.

1054. Allegations are not as to our named Defendants and no answer is required.

1055. Allegations are not as to our named Defendants and no answer is required.

1056. Allegations are not as to our named Defendants and no answer is required.

1057. Allegations are not as to our named Defendants and no answer is required.

1058. Allegations are not as to our named Defendants and no answer is required.

1059. Allegations are not as to our named Defendants and no answer is required.

1060. Allegations are not as to our named Defendants and no answer is required.

1061. Allegations are not as to our named Defendants and no answer is required.

1062. Allegations are not as to our named Defendants and no answer is required.

**COUNT 23
BLUE CROSS VIOLATED CONFIDENTIALITY
OF PATIENTS MEDICAL RECORDS**

1063. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 1062 above, as though fully set forth herein.

1064. Allegations are not as to our named Defendants and no answer is required.

1065. Allegations are not as to our named Defendants and no answer is required.

1066. Allegations are not as to our named Defendants and no answer is required.

1067. Allegations are not as to our named Defendants and no answer is required.

1068. Allegations are not as to our named Defendants and no answer is required.

1069. Allegations are not as to our named Defendants and no answer is required.

1070. Allegations are not as to our named Defendants and no answer is required.

1071. Allegations are not as to our named Defendants and no answer is required.

1072. Allegations are not as to our named Defendants and no answer is required.

1073. Allegations are not as to our named Defendants and no answer is required.

1074. Allegations are not as to our named Defendants and no answer is required.

1075. Allegations are not as to our named Defendants and no answer is required.

1076. Allegations are not as to our named Defendants and no answer is required.

COUNT 24
BLUE CROSS AIDED AND ABETTED JAMES HOWELL
TO VIOLATE STATE AND FEDERAL STATUTES

1077. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 1076 above, as though fully set forth herein.

1078. Allegations are not as to our named Defendants and no answer is required.

1079. Allegations are not as to our named Defendants and no answer is required.

1080. Allegations are not as to our named Defendants and no answer is required.

1081. Allegations are not as to our named Defendants and no answer is required.

1082. Allegations are not as to our named Defendants and no answer is required.

1083. Allegations are not as to our named Defendants and no answer is required.

1084. Allegations are not as to our named Defendants and no answer is required.

1085. Allegations are not as to our named Defendants and no answer is required.

1086. Allegations are not as to our named Defendants and no answer is required.

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1088. Allegations are not as to our named Defendants and no answer is required.

1089. Allegations are not as to our named Defendants and no answer is required.

1090. Allegations are not as to our named Defendants and no answer is required.

1091. Allegations are not as to our named Defendants and no answer is required.

1092. Allegations are not as to our named Defendants and no answer is required.

1093. Allegations are not as to our named Defendants and no answer is required.

1094. Allegations are not as to our named Defendants and no answer is required.

1095. Allegations are not as to our named Defendants and no answer is required.

COUNT 25
DR. POMPY WAS AND IS STILL BEING DEFAMED BY BLUE CROSS

1096. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 1095 above, as though fully set forth herein.

1097. Allegations are not as to our named Defendants and no answer is required.

1098. Allegations are not as to our named Defendants and no answer is required.

1099. Allegations are not as to our named Defendants and no answer is required.

1100. Allegations are not as to our named Defendants and no answer is required.

1101. Allegations are not as to our named Defendants and no answer is required.

1102. Allegations are not as to our named Defendants and no answer is required.

1103. Allegations are not as to our named Defendants and no answer is required.

1104. Allegations are not as to our named Defendants and no answer is required.

1105. Allegations are not as to our named Defendants and no answer is required.

1106. Allegations are not as to our named Defendants and no answer is required.

1107. Allegations are not as to our named Defendants and no answer is required.

1108. Allegations are not as to our named Defendants and no answer is required.

1109. Allegations are not as to our named Defendants and no answer is required.

1110. Allegations are not as to our named Defendants and no answer is required.

1111. Allegations are not as to our named Defendants and no answer is required.

1112. Allegations are not as to our named Defendants and no answer is required.

1113. Allegations are not as to our named Defendants and no answer is required.

1114. Allegations are not as to our named Defendants and no answer is required.

1115. Allegations are not as to our named Defendants and no answer is required.

1116. Allegations are not as to our named Defendants and no answer is required.

1117. Allegations are not as to our named Defendants and no answer is required.

1118. Allegations are not as to our named Defendants and no answer is required.

1119. Allegations are not as to our named Defendants and no answer is required.

1120. Allegations are not as to our named Defendants and no answer is required.

1121. Allegations are not as to our named Defendants and no answer is required.

1122. Allegations are not as to our named Defendants and no answer is required.

COUNT 26
DR. CARL CHRISTENSEN CONSPIRED WITH BLUE CROSS AND
JAMES HOWELL TO VIOLATE STATE AND FEDERAL STATUTES

1123. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 – 1122 above, as though fully set forth herein.

1124. Allegations are not as to our named Defendants and no answer is required.

1125. Allegations are not as to our named Defendants and no answer is required.

1126. Allegations are not as to our named Defendants and no answer is required.

1127. Allegations are not as to our named Defendants and no answer is required.

1128. Allegations are not as to our named Defendants and no answer is required.

1129. Allegations are not as to our named Defendants and no answer is required.

1130. Allegations are not as to our named Defendants and no answer is required.

1131. Allegations are not as to our named Defendants and no answer is required.

1132. Allegations are not as to our named Defendants and no answer is required.

1133. Allegations are not as to our named Defendants and no answer is required.

1134. Allegations are not as to our named Defendants and no answer is required.

1135. Allegations are not as to our named Defendants and no answer is required.

1136. Allegations are not as to our named Defendants and no answer is required.

1137. Allegations are not as to our named Defendants and no answer is required.

1138. Allegations are not as to our named Defendants and no answer is required.

1139. Allegations are not as to our named Defendants and no answer is required.

1140. Allegations are not as to our named Defendants and no answer is required.

1141. Allegations are not as to our named Defendants and no answer is required.

COUNT 27

DR. J. ALLAN ROBERTSON CONSPIRED WITH BLUE CROSS AND JAMES HOWELL TO VIOLATE STATE AND FEDERAL STATUTES

1142. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 1141 above, as though fully set forth herein.

1143. Allegations are not as to our named Defendants and no answer is required.

1144. Allegations are not as to our named Defendants and no answer is required.

1145. Allegations are not as to our named Defendants and no answer is required.

1146. Allegations are not as to our named Defendants and no answer is required.

1147. Allegations are not as to our named Defendants and no answer is required.

1148. Allegations are not as to our named Defendants and no answer is required.

1149. Allegations are not as to our named Defendants and no answer is required.

1150. Allegations are not as to our named Defendants and no answer is required.

1151. Allegations are not as to our named Defendants and no answer is required.

1152. Allegations are not as to our named Defendants and no answer is required.

COUNT 28
MB&T VIOLATED MICHIGAN REQUIREMENT
TO GIVE NOTICE OF ADVERSE CLAIM TO THE DEPOSITORS

1153. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 1152 above, as though fully set forth herein.

1154. Allegations are not as to our named Defendants and no answer is required.

1155. Allegations are not as to our named Defendants and no answer is required.

1156. Allegations are not as to our named Defendants and no answer is required.

1157. Allegations are not as to our named Defendants and no answer is required.

1158. Allegations are not as to our named Defendants and no answer is required.

1159. Allegations are not as to our named Defendants and no answer is required.

1160. Allegations are not as to our named Defendants and no answer is required.

1161. Allegations are not as to our named Defendants and no answer is required.

1162. Allegations are not as to our named Defendants and no answer is required.

1163. Allegations are not as to our named Defendants and no answer is required.

1164. Allegations are not as to our named Defendants and no answer is required.

1165. Allegations are not as to our named Defendants and no answer is required.

1166. Defendants deny as untrue.

1167. Defendants deny as untrue.

1168. Defendants deny as untrue.

1169. Defendants deny as untrue.

1170. Defendants deny as untrue.

1171. Defendants deny as untrue.

1172. Defendants deny as untrue.

1173. Defendants deny as untrue.

1174. Defendants deny as untrue.

1175. Defendants deny as untrue.

COUNT 29
DEFENDANTS SHELLY EDGERTON, KIM GAEDEKE, AND SEAN M.
SIEBIGTEROTH VIOLATED STATE AND FEDERAL LAWS, INCLUDING
THE RULES OF THE DEPARTMENT OF LICENSING AND
REGULATORY AFFAIRS ON THE SERVICE OF PROCESS BY DEA
AGENT BISHOP, JOINTLY OR SEVERALLY

1176. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 1175 above, as though fully set forth herein.

1177. Allegations are not as to our named Defendants and no answer is required.

1178. Allegations are not as to our named Defendants and no answer is required.

1179. Allegations are not as to our named Defendants and no answer is required.

1180. Allegations are not as to our named Defendants and no answer is required.

1181. Allegations are not as to our named Defendants and no answer is required.

1182. Allegations are not as to our named Defendants and no answer is required.

1183. Allegations are not as to our named Defendants and no answer is required.

1184. Allegations are not as to our named Defendants and no answer is required.

1185. Allegations are not as to our named Defendants and no answer is required.

1186. Allegations are not as to our named Defendants and no answer is required.

1187. Allegations are not as to our named Defendants and no answer is required.

1188. Allegations are not as to our named Defendants and no answer is required.

1189. Allegations are not as to our named Defendants and no answer is required.

1190. Allegations are not as to our named Defendants and no answer is required.

1191. Allegations are not as to our named Defendants and no answer is required.

1192. Allegations are not as to our named Defendants and no answer is required.

1193. Allegations are not as to our named Defendants and no answer is required.

1194. Allegations are not as to our named Defendants and no answer is required.

1195. Allegations are not as to our named Defendants and no answer is required.

1196. Allegations are not as to our named Defendants and no answer is required.

1197. Allegations are not as to our named Defendants and no answer is required.

1198. Allegations are not as to our named Defendants and no answer is required.

1199. Allegations are not as to our named Defendants and no answer is required.

2000. [sic] Allegations are not as to our named Defendants and no answer is required.

2001. Allegations are not as to our named Defendants and no answer is required.

COUNT 30
DEFENDANT VAUGHN HAFNER VIOLATED
MICHIGAN PUBLIC HEALTH CODE

2002. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2001 above, as though fully set forth herein.

2003. Allegations are not as to our named Defendants and no answer is required.

2004. Allegations are not as to our named Defendants and no answer is required.

2005. Allegations are not as to our named Defendants and no answer is required.

2006. Allegations are not as to our named Defendants and no answer is required.

2007. Allegations are not as to our named Defendants and no answer is required.

2008. Allegations are not as to our named Defendants and no answer is required.

2009. Allegations are not as to our named Defendants and no answer

is required.

2010. Allegations are not as to our named Defendants and no answer is required.

2011. Allegations are not as to our named Defendants and no answer is required.

2012. Allegations are not as to our named Defendants and no answer is required.

2013. Allegations are not as to our named Defendants and no answer is required.

2014. Allegations are not as to our named Defendants and no answer is required.

2015. Allegations are not as to our named Defendants and no answer is required.

2016. Allegations are not as to our named Defendants and no answer is required.

2017. Allegations are not as to our named Defendants and no answer is required.

2018. Allegations are not as to our named Defendants and no answer is required.

2019. Allegations are not as to our named Defendants and no answer is required.

2020. Allegations are not as to our named Defendants and no answer is required.

2021. Allegations are not as to our named Defendants and no answer is required.

2022. Allegations are not as to our named Defendants and no answer is required.

2023. Allegations are not as to our named Defendants and no answer is required.

COUNT 31
MEDICAL RECORDS AND ELECTRONIC DEVICES SEIZED BY MSP
AND DEA ON SEPTEMBER 26, 2016 ARE TAINTED AND SHOULD BE
SUPPRESSED IN ALL PROCEEDINGS, PAST, PRESENT OR FUTURE
[SIC]

2024. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2023 above, as though fully set forth herein.

2025. Defendants deny as untrue.

2026. Defendants deny as untrue.

2027. Defendants deny as untrue.

2028. Defendants deny as untrue.

2029. Defendants deny as untrue.

2030. (a. – m.) Defendants deny as untrue.

2031. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2032. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2033. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2034. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2035. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2036. Defendants deny as untrue.

2037. Defendants deny as untrue.

2038. Defendants deny as untrue.

2039. Defendants deny as untrue.

2040. Defendants deny as untrue.

COUNT 32
BLUE CROSS, JAMES HOWELL, ALIAS “JAMES STEWARD”, DR.
CARL CHRISTENSEN ARE COLLATERALLY ESTOPPED FROM
OFFERING EVIDENCE IN ANY PROCEEDINGS

2041. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2040 above, as though fully set forth herein.

2042. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2043. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2044. Defendants deny as untrue.

2045. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2046. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2047. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2048. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2049. Defendants deny as untrue.

2050. Defendants are without sufficient information upon which to

form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2051. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2052. Defendants deny as untrue.

2053. Defendants deny as untrue.

2054. Defendants deny as untrue.

2055. Defendants deny as untrue.

COUNT 33

**BLUE CROSS OPERATION IN 83 MICHIGAN COUNTIES IS A
NEGLIGENT, CORRUPT, FRAUDULENT PATTERN VIOLATIVE OF THE
ANTITRUST LAWS, INCLUDING, BUT NOT LIMITED TO, THE
SHERMAN ACT, THE FEDERAL TRADE COMMISSION ACT AGAINST
UNFAIR METHODS OF COMPETITION, THE FTC ACT**

2056. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2055 above, as though fully set forth herein.

2057. Allegations are not as to our named Defendants and no answer is required.

2058. Allegations are not as to our named Defendants and no answer is required.

2059. Allegations are not as to our named Defendants and no answer is required.

2060. Allegations are not as to our named Defendants and no answer

is required.

2061. Allegations are not as to our named Defendants and no answer is required.

2062. Allegations are not as to our named Defendants and no answer is required.

2063. Allegations are not as to our named Defendants and no answer is required.

2064. Allegations are not as to our named Defendants and no answer is required.

2065. Allegations are not as to our named Defendants and no answer is required.

2066. Allegations are not as to our named Defendants and no answer is required.

2067. Allegations are not as to our named Defendants and no answer is required.

2068. Allegations are not as to our named Defendants and no answer is required.

2069. Allegations are not as to our named Defendants and no answer is required.

2070. Allegations are not as to our named Defendants and no answer is required.

2071. Allegations are not as to our named Defendants and no answer is required.

2072. Allegations are not as to our named Defendants and no answer is required.

2073. Allegations are not as to our named Defendants and no answer is required.

2074. Allegations are not as to our named Defendants and no answer is required.

2075. Allegations are not as to our named Defendants and no answer is required.

COUNT 34
DR. CARL CHRISTENSEN REVIEW OF AND REPORT ON HOWELL
ILLEGAL VIDEOS AND REPORTS ARE EQUALLY ILLEGAL AND
SHOULD BE SUPPRESSED

2075. [sic] Allegations are not as to our named Defendants and no answer is required.

2076. Defendants deny as untrue.

2077. Defendants deny as untrue.

2078. Defendants deny as untrue.

2079. Defendants deny as untrue.

2080. Defendants deny as untrue.

2081. Defendants deny as untrue.

2082. Defendants deny as untrue.

2083. Defendants deny as untrue.

**COUNT 35
TRANSFERRED INTENT**

2084. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2083 above, as though fully set forth herein.

2085. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2086. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2087. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2088. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2089. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2090. Defendants are without sufficient information upon which to

form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2091. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2092. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2093. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2094. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2095. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2096. Defendants deny as untrue.

2097. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2098. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2099. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2100. Defendants are without sufficient information upon which to

form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2101. Defendants deny as untrue.

2102. Defendants deny as untrue.

2103. Defendants deny as untrue.

COUNT 36
DR. POMPY COMMITTED NO CRIMINAL OFFENSE

2104. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2103 above, as though fully set forth herein.

2105. Defendants deny as untrue.

2106. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2107. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2108. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2109. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2110. (a. – d.) Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2111. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2112. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2113. Defendants deny as untrue.

2114. (a. – b.) Defendants deny as untrue.

2115. Defendants deny as untrue.

2116. Defendants deny as untrue.

2117. Defendants deny as untrue.

2118. Defendants deny as untrue.

2119. Defendants deny as untrue.

COUNT 37
DEFENDANT JAMES HOWELL COMMITTED
HEALTH CARE FRAUDS AGAINST BLUE CROSS
WITH THE PARTICIPATION OF LT. MARC MOORE

2120. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2119 above, as though fully set forth herein.

2121. Allegations are not as to our named Defendants and no answer is required.

2122. Allegations are not as to our named Defendants and no answer is required.

2123. Allegations are not as to our named Defendants and no answer is required.

2124. Allegations are not as to our named Defendants and no answer is required.

2125. Allegations are not as to our named Defendants and no answer is required.

2126. (1. – 17.) Allegations are not as to our named Defendants and no answer is required.

2127. Allegations are not as to our named Defendants and no answer is required.

2128. Allegations are not as to our named Defendants and no answer is required.

2129. Allegations are not as to our named Defendants and no answer is required.

2130. Allegations are not as to our named Defendants and no answer is required.

2131. Allegations are not as to our named Defendants and no answer is required.

2132. Allegations are not as to our named Defendants and no answer

is required.

2133. Allegations are not as to our named Defendants and no answer is required.

2134. Allegations are not as to our named Defendants and no answer is required.

2135. Allegations are not as to our named Defendants and no answer is required.

COUNT 38
DEFENDANTS JAMES HOWELL COMMITTED TAX FRAUDS WITH THE
PARTICIPATEION OF BLUE CROSS AND LT. MARC MOORE

2136. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2135 above, as though fully set forth herein.

2137. Allegations are not as to our named Defendants and no answer is required.

2138. Allegations are not as to our named Defendants and no answer is required.

2139. Allegations are not as to our named Defendants and no answer is required.

2140. Allegations are not as to our named Defendants and no answer is required.

2141. Allegations are not as to our named Defendants and no answer is required.

2142. Allegations are not as to our named Defendants and no answer is required.

2143. Allegations are not as to our named Defendants and no answer is required.

2144. Allegations are not as to our named Defendants and no answer is required.

2145. Allegations are not as to our named Defendants and no answer is required.

2146. Allegations are not as to our named Defendants and no answer is required.

2147. Allegations are not as to our named Defendants and no answer is required.

COUNT 39
DR. POMPY WAS FRAMED BY LT. MARC MOORE
AND JAMES HOWELL [SIC]

2148. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2147 above, as though fully set forth herein.

2149. Defendants are without sufficient information upon which to

form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2150. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2151. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2152. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2153. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2154. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2155. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2156. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2157. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2158. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

COUNT 40
DR. POMPY WAS FRAMED BY AGENT BRIAN BISHOP

2159. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2158 above, as though fully set forth herein.

2160. Allegations are not as to our named Defendants and no answer is required.

2161. Allegations are not as to our named Defendants and no answer is required.

2162. Allegations are not as to our named Defendants and no answer is required.

2163. Allegations are not as to our named Defendants and no answer is required.

2164. Allegations are not as to our named Defendants and no answer is required.

2165. Allegations are not as to our named Defendants and no answer is required.

2166. Allegations are not as to our named Defendants and no answer is required.

2167. Allegations are not as to our named Defendants and no answer is required.

2168. Allegations are not as to our named Defendants and no answer is required.

2169. Allegations are not as to our named Defendants and no answer is required.

2170. Allegations are not as to our named Defendants and no answer is required.

2171. Allegations are not as to our named Defendants and no answer is required.

2172. Allegations are not as to our named Defendants and no answer is required.

**COUNT 41
LAW ENFORCEMENT VIOLATED 451 U.S. 204 (1981)
AND THE 4TH AMENDMENT**

2173. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2172 above, as though fully set forth herein.

2174. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2175. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2176. Defendants deny as untrue.

2177. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2178. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2179. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2180. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2181. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2182. Defendants deny as untrue.

2183. Defendants deny as untrue.

2184. Defendants deny as untrue.

2185. Defendants deny as untrue.

2186. Defendants deny as untrue.

2187. Defendants deny as untrue.

COUNT 42
DEFENDANT ROBERT BLAIR MISLED THE MONROE COUNTY
CIRCUIT COURT AND THE FIRST DISTRICT COURT OF MICHIGAN

2188. Defendants hereby incorporate by reference each and every

answer to Paragraphs 1 - 2187 above, as though fully set forth herein.

2189. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2190. Defendants deny as untrue.

2191. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2192. Defendants deny as untrue.

2193. Defendants deny as untrue.

2194. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2195. Defendants deny as untrue.

2196. Defendants deny as untrue.

2197. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2198. Defendants deny as untrue.

2199. Defendants deny as untrue.

2200. Defendants deny as untrue.

2201. Defendants deny as untrue.

2202. Defendants deny as untrue.

2203. Defendants deny as untrue.

2204. Defendants deny as untrue.

COUNT 43

**DEFENDANTS MSP/MANTIS DETECTIVE ROBERT BLAIR,
MSP/MANTIS JON LASOTA, DEA AGENT BRIAN BISHOP, ILLEGALLY
EXECUTED EIGHT SEARCH WARRANTS**

2205. Defendants hereby incorporate by reference each and every answer to Paragraphs 1 - 2204 above, as though fully set forth herein. Defendants deny as untrue.

2206. Defendants deny as untrue.

2207. Defendants deny as untrue.

2208. Defendants deny as untrue.

2209. Defendants deny as untrue.

2210. Defendants are without sufficient information upon which to form a belief and neither admit nor deny, but leave Plaintiff to his proofs.

2211. Defendants deny as untrue.

2212. Defendants deny as untrue.

2213. Defendants deny as untrue.

2214. Defendants deny as untrue.

2215. Defendants deny as untrue.

2216. Defendants deny as untrue.

2217. Defendants deny as untrue.

2218. Defendants deny as untrue.

WHEREFORE, Defendants ask this Court to dismiss the claim brought against them, in its entirety and with prejudice, and to award such costs, including a reasonable attorney fees, as may be permitted by law.

Respectfully submitted,

ROSATI SCHULTZ JOPPICH &
AMTSBUECHLER PC

s/DANIEL A. KLEMPNER
Attorney for Defendant
27555 Executive Drive, Suite 250
Farmington Hills, MI 48331-3550
(248) 489-4100
(P68691)

Dated: March 1, 2019

AFFIRMATIVE AND OTHER DEFENSES

Defendants may rely upon the following Affirmative and other defenses at or before the time of trial:

1. Plaintiff's Complaint has failed to state a claim upon which relief can be granted.
2. Plaintiff's claims may be barred by the applicable statute of limitations.

3. Plaintiff has failed to join a necessary or an indispensable party.
4. The proximate cause of any and all injuries suffered by Plaintiff is the result of Plaintiff's own voluntary misconduct, as well as contributory and/or comparative negligence.
5. Plaintiff is barred and/or will be precluded from maintaining this cause of action by the Doctrines of Laches, Waiver, Collateral Estoppel, Res Judicata, Misrepresentation, Unclean Hands, Satisfaction, Settlement and Release.
6. Defendants were justified in their actions and their actions were lawful, in good faith, without malice and within the ordinances, policies, customs, and regulations of the State of Michigan and the United States.
7. To the extent applicable, Defendants would plead the collateral source rule.
8. This cause of action is barred in its entirety, or in part, by governmental immunity.
9. This cause of action is barred in its entirety, or in part, by absolute and/or judicial immunity.

10. This cause of action is barred in its entirety, or in part, by qualified immunity.
11. Plaintiff has failed to mitigate damages.
12. Plaintiff's claims are barred because Plaintiff has failed to identify an official policy, custom, or practice which has been adopted by Defendants.
13. Plaintiff's Complaint is barred for the reason that Defendants' actions do not constitute deliberate indifference or conduct which shocks the conscience.
14. The complained of damages are the result of intentional acts of the Plaintiff in, whole or in part, and have no relation to any acts and/or omissions by the Defendants.
15. That there is no vicarious and/or respondeat superior liability pursuant to 42 USC §1983 or the Governmental Tort Liability Act, MCL 691.1401 *et. seq.*
16. Defendants were not deliberately indifferent.
17. Plaintiff has not set forth a protected liberty interest otherwise protected pursuant to 42 U.S.C. §1983 and *Parratt v Taylor*, 451 US 527 (1981).

18. Plaintiff is subject to any and all statutory damage limitations.
19. Plaintiff is not entitled to punitive or exemplary damages from Defendants as a matter of law.
20. Plaintiff cannot show a causal connection between the actions complained of and any alleged damages.
21. Defendants assert that abstention principles bar Plaintiff's lawsuit.
22. There is no private cause of action for a violation of HIPPA and/or the Computer Fraud Act as alleged by Plaintiff.
23. Plaintiff is barred from pursuing any claim on behalf of Interventional Pain Management Associates, P.C. because Plaintiff is not any attorney and he is therefore not permitted to represent a corporate entity in a court proceeding.
24. Plaintiff lacks standing to assert an injury on behalf of Interventional Pain Management Associates P.C.

Defendants reserve the right to assert further Affirmative Defenses
upon discovery of facts not presently known

Respectfully submitted,

ROSATI SCHULTZ JOPPICH &
AMTSBUECHLER PC

s/DANIEL A. KLEMPNER

Attorney for Defendant

27555 Executive Drive, Suite 250

Farmington Hills, MI 48331-3550

(248) 489-4100

(P68691)

Dated: March 1, 2019

RELIANCE ON DEMAND FOR JURY TRIAL

NOW COME the Defendants, by and through their attorneys, ROSATI SCHULTZ JOPPICH & AMTSBUECHLER PC, by DANIEL A. KLEMPPTNER, and hereby relies upon the demand for a trial by jury previously requested in the above-entitled cause of action.

Respectfully submitted,

ROSATI SCHULTZ JOPPICH &
AMTSBUECHLER PC

s/DANIEL A. KLEMPPTNER
Attorney for Defendant
27555 Executive Drive, Suite 250
Farmington Hills, MI 48331-3550
(248) 489-4100
(P68691)

Dated: March 1, 2019

PROOF OF SERVICE

I hereby certify that on March 1, 2019, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all parties of record and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants:

Lesly Pompy
533 N. Monroe Street
Monroe, MI 48162
(734) 819-0634

Interventional Pain Management Associates, P.C.
c/o Lesly Pompy
533 N. Monroe Street
Monroe, MI 48162

/s/ Lori A. Gazdag